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## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY TRENTON VICINAGE

In re:	
-	Case No. 19-13417
KAREN WALDORF	
	Chapter 13
Chapter 13 Debtor	

## DECLARATION OF ERIC WALDORF IN FURTHER SUPPORT OF MOTION TO DISMISS

Hon.

Christine M. Gravelle

Eric Waldorf, of full age, declares as follows under penalty of perjury and pursuant to 28 U.S.C. §1746:

- I am an individual resident of the State of New Jersey and the interested party/creditor in the within matter.
- 2. As such, I have personal knowledge of the facts set forth in this declaration, which I make in further support of my motion to dismiss the within case by reason of the Debtor's bad faith.
- The Debtor alleges that her case did not require my approval of loan modification because I am not on the deed to the property.
- 4. My name is still on the mortgage and she requires my signature on the loan modification, so how my consent (which I do not give) was not necessary is inconceivable.
- 5. Debtor further makes the allegation that when I left the marital home her jewelry all mysteriously disappeared. This allegation is beyond ludicrous. The Debtor had tens of thousands of dollars of jewelry, which I had bought for her during our marriage. That the said jewelry would magically vanish is unlikely at best.

- 6. The Debtor's successful completion of her plan is impossible on its face as is made even more clear by her demand in her motion to approve and compel that I be required to give her my personal information for a SECOND loan modification.
- 7. I am not going to consent or sign these modification agreements and I do not believe that the Court has the authority to compel me to accept them.
- 8. The Debtor is trying to accomplish the impossible and knew it when she filed.
- 9. Moreover, I reiterate to the Court that the Debtor's petition has myriad omissions and deliberate falsehoods which further illustrate her bad faith in filing this case.
- 10. As such, the case should be dismissed.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND INFORMATION. I UNDERSTAND THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE. I AM SUBJECT TO PENALTIES OF PERJURY.

Dated: September 25, 2019	/s/Eric Waldorf
	FRIC WAI DORF